

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

<p>R2 Solutions LLC,</p> <p>Plaintiff,</p> <p>v.</p> <p>Deezer S.A.,</p> <p>Defendant.</p>	<p>Civil Action No. 4:21-cv-00090-ALM</p> <p>Jury Trial Demanded</p>
<p>R2 Solutions LLC,</p> <p>Plaintiff,</p> <p>v.</p> <p>Charles Schwab Corp.,</p> <p>Defendant.</p>	<p>Civil Action No. 4:21-cv-00122-ALM</p> <p>Jury Trial Demanded</p>
<p>R2 Solutions LLC,</p> <p>Plaintiff,</p> <p>v.</p> <p>JPMorgan Chase & Co.,</p> <p>Defendant.</p>	<p>Civil Action No. 4:21-cv-00174-ALM</p> <p>Jury Trial Demanded</p>

JOINT MOTION TO MODIFY PATENT SCHEDULING ORDER

Plaintiff and all Defendants (the “Parties”) jointly file this agreed-upon motion to modify certain deadlines in the Patent Scheduling Order. ECF 22 (-090 Case); ECF 22 (-122 Case); ECF 18 (-174 Case). The parties have conferred regarding flexibility in the current schedule and certain, necessary adjustments to discovery, expert reporting and dispositive motions deadlines. To this end, the parties respectfully request that the Patent Scheduling Order be modified, in pertinent part, as follows:

Event	Current Date	Proposed Date
Deadline for Initial Mandatory Disclosures	February 10, 2022	March 10, 2022
Fact discovery deadline	n/a	April 12, 2022
Opening expert reports	March 10, 2022	April 26, 2022
Rebuttal expert reports	April 14, 2022	May 24, 2022
Expert discovery deadline	April 21, 2022	June 7, 2022
Dispositive motions deadline	March 21, 2022	June 17, 2022

The parties believe that these extensions will assist the parties in fulfilling their discovery obligations in advance of expert reporting and will help reduce, or perhaps eliminate, Court involvement in pressing discovery issues. All other deadlines would remain unchanged. A proposed Amended Patent Scheduling Order is included with this Motion as Exhibit A for the Court’s consideration and entry.

Dated: January 14, 2022

By: /s/ Edward R. Nelson III

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CERTIFICATE OF CONFERENCE

Counsel for the parties met and conferred about the relief sought by this motion on January 11-13, 2022, and the parties jointly request the relief sought.

/s/ Edward R. Nelson III

CERTIFICATE OF SERVICE

The undersigned certifies that on January 14, 2022, the foregoing document was filed electronically in compliance with Local Rule CV-5(a). This motion was served on all counsel by electronic filing.

/s/ Edward R. Nelson III